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Attorneys for Defendant
COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

MOSTAFA TAGHAVI,

Plaintiff,

vs.

COSTCO WHOLESALE
CORPORATION, DOES 1 THROUGH 20,
Defendants.

CASE NO.:

**NOTICE OF REMOVAL OF
ACTION UNDER 28 U.S.C. § 1441**

PLEASE TAKE NOTICE that Defendant, COSTCO WHOLESALE CORPORATION hereby removes the above-captioned action from the Superior Court of the State of California, Orange County, where it is currently pending as Case No. 30-2022-01274833-CU-PL-CJC, to the United States District Court for the Central District of California – Southern Division.

Removal is warranted under 28 U.S.C. §1441(b) because this is a civil action over which this Court has subject matter jurisdiction under 28 U.S.C. §1332, on the grounds that complete diversity exists between the parties and the amount in controversy exceeds the sum of \$75,000.

Plaintiff is a resident of Orange County in the State of California. Defendant COSTCO WHOLESALE CORPORATION (hereinafter “COSTCO”), a corporate

1 entity, is a Washington Corporation with its principal place of business in Issaquah,
2 Washington and is therefore a citizen of the State of Washington for purposes of
3 determining diversity. Pursuant to 28 U.S.C. §1332(c)(1) full diversity exists among
4 the parties in this action since Defendants are incorporated and maintain their
5 respective places of business in a different state than where Plaintiff is a citizen.

6 **BACKGROUND**

7 On or about August 10, 2022, Plaintiff, MOSTAFA TAGHAVI commenced
8 an action in the Superior Court of the State of California in the County of Orange,
9 entitled *Mostafa Taghavi v. Costco Wholesale Corporation, Does 1 through 20; Case*
10 *No. 30-2022-01274833-CU-PL-CJC*. Pursuant to 28 U.S.C. § 1446(a), copies of all
11 process, pleadings, and orders served upon Defendant COSTCO are attached hereto
12 as **Exhibit A**. Plaintiff's complaint asserts a cause of action for Premises Liability.

13 On or about August 23, 2019, Plaintiff had COSTCO, a corporate entity,
14 served with the Complaint via personal service on their agent for service of process
15 in California.

16 **GROUND FOR REMOVAL**

17 The amount in controversy exceeds \$75,000.00, as evidenced by Plaintiff's
18 previous demand, which alleges he suffered from serious and severe injuries as a
19 result of a slip and fall on COSTCO property. Specifically, Plaintiff's counsel
20 provided a prior demand of \$250,000 in a correspondence dated March 8, 2022. The
21 correspondence regarding Plaintiff's prior demand is attached as **Exhibit B**.

22 **DIVERSITY OF CITIZENSHIP**

23 Plaintiff MOSTAFA TAGHAVI resides in the County of Orange, in the State
24 of California, and, as such, is a resident of the State of California, as evidenced by
25 his complaint attached as **Exhibit A**. Defendant COSTCO is a Washington
26 Corporation with its principal place of business in Issaquah, Washington, and is
27 therefore a citizen of the State of Washington for purposes of determining diversity.

28 This Notice of Removal was filed within thirty days of service of the

1 Complaint, which was completed on August 23, 2022. Pursuant to 28 U.S.C. §
2 1446(a), copies of all process, pleadings, and orders served upon Defendant
3 COSTCO are attached hereto as **Exhibit A**. Pursuant to 28 U.S.C. § 1446(d), a Notice
4 to Adverse Parties of Removal to Federal Court, attached hereto as **Exhibit C**,
5 together with this Notice of Removal, is being served upon counsel for Plaintiff and
6 will be filed with the Clerk of the Superior Court of the State of California, County
7 of Los Angeles.

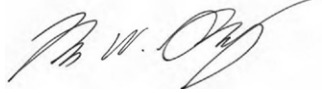
8 Based on the foregoing, this Court has jurisdiction over this action. No
9 previous application has been made for the relief requested herein. Accordingly, this
10 action is properly removed.

11 WHEREFORE, Defendants, and each of them, file this Notice of Removal so
12 that the entire action *Mostafa Taghavi v. Costco Wholesale Corporation, Does 1*
13 *through 20; Case No. 30-2022-01274833-CU-PL-CJC*, now pending in the Superior
14 Court of California, Orange County, shall be removed to this Court for all further
15 proceedings.

16
17 DATED: September 22, 2022

FREEMAN MATHIS & GARY, LLP

18
19 By:



BRIAN SKALSKY, ESQ.
KINGSLEY FORRESTER, ESQ.
Attorneys for Defendants,
COSTCO WHOLESALE WAREHOUSE

EXHIBIT “A”

**SUMMONS
(CITACION JUDICIAL)**

SUM-100

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

COSTCO WHOLESALE CORPORATION, DOES 1 THROUGH 20

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**
MOSTAFA TAGHAVI

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desochar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

Superior Court of County of Orange, 700 Civic Center Drive West, Santa Ana, CA

CASE NUMBER:
(Número del Caso): Judge Michael Strickroth
30-2022-01274833-CU-PL-CJC

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Ali R. Mirhosseini, Esq. Mirhosseini Law Group APC 1502 N. Broadway, Santa Ana, California 92706; (714) 560-9100

DATE: 08/17/2022 Clerk, by DAVID H. YAMASAKI, Clerk of the Court (Secretario) *L. Sanchez*, Deputy (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)). L. Sanchez



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):
4. ☐ by personal delivery on (date):

PLD-PI-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): ALI R. MIRHOSSEINI, ESQ. MIRHOSSEINI LAW GROUP, APC 1502 N. BROADWAY SANTA ANA, CALIFORNIA 92706 TELEPHONE NO: 714-560-9100 FAX NO. (Optional): 714-560-9120 E-MAIL ADDRESS (Optional): ALI@ARMLAW.NET ATTORNEY FOR (Name): PLAINTIFF, MOSTAFA TAGHAVI	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 CIVIC CENTER DRIVE WEST MAILING ADDRESS: CITY AND ZIP CODE: SANTA ANA, CALIFORNIA 92701 BRANCH NAME: CENTRAL JUDICIAL DISTRICT	
PLAINTIFF: MOSTAFA TAGHAVI DEFENDANT: COSTCO WHOLESALE CORPORATION <input checked="" type="checkbox"/> DOES 1 TO 20	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): PREMISES LIABILITY <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (specify):	CASE NUMBER: 30-2022-01274833-CU-PL-CJC
Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited	Assigned for All Purposes Judge Michael Strickroth

1. Plaintiff (name or names): MOSTAFA TAGHAVI
 alleges causes of action against defendant (name or names):
 COSTCO WHOLESALE CORPORATION
 2. This pleading, including attachments and exhibits, consists of the following number of pages:
 3. Each plaintiff named above is a competent adult:
 - a. ☐ except plaintiff (name):
 - (1) ☐ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ a public entity (describe):
 - (4) ☐ a minor ☐ an adult
 - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) ☐ other (specify):
 - (5) ☐ other (specify):
 - b. ☐ except plaintiff (name):
 - (1) ☐ a corporation qualified to do business in California
 - (2) ☐ an unincorporated entity (describe):
 - (3) ☐ a public entity (describe):
 - (4) ☐ a minor ☐ an adult
 - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) ☐ other (specify):
 - (5) ☐ other (specify):
- ☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

Page 1 of 3

PLD-PI-001

SHORT TITLE:

Taghavi v. Costco Wholesale, et al.

CASE NUMBER:

4. ☐ Plaintiff (name):
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. ☒ except defendant (name): Costco Wholesale Corp.
 (1) ☐ a business organization, form unknown
 (2) ☒ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- c. ☐ except defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- b. ☐ except defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- d. ☐ except defendant (name):
 (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (describe):
 (4) ☐ a public entity (describe):
 (5) ☐ other (specify):
- ☐ Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. ☒ Doe defendants (specify Doe numbers): 1-5 _____ were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. ☒ Doe defendants (specify Doe numbers): 6-15 _____ are persons whose capacities are unknown to plaintiff.
7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a. ☐ at least one defendant now resides in its jurisdictional area.
- b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.
- d. ☐ other (specify):
9. ☐ Plaintiff is required to comply with a claims statute, and
- a. ☐ has complied with applicable claims statutes, or
- b. ☐ is excused from complying because (specify):

PLD-PI-001

SHORT TITLE:

Taghavi v. Costco Wholesale, et al.

CASE NUMBER:

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☐ Motor Vehicle
- b. ☐ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☒ Premises Liability
- f. ☐ Other (specify):

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☐ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☐ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (specify):
SUCH OTHER DAMAGES THAT THE COURT DEEMS APPROPRIATE

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☐ punitive damages

The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):

- (1) ☒ according to proof
- (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):
PREM.L1

Date: 08/4/2022

Ali R. Mirhosseini, Esq.

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

PLD-PI-001(4)

SHORT TITLE:
Taghavi v. Costco Wholesale Corp.

CASE NUMBER:

FIRST

CAUSE OF ACTION—Premises Liability

Page 4

(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

Prem.L-1. Plaintiff (name): MOSTAFA TAGHAVI

alleges the acts of defendants were the legal (proximate) cause of damages to plaintiff.

On (date): 02/03/2021

plaintiff was injured on the following premises in the following

fashion (description of premises and circumstances of injury):

At the premises occupied by defendant Costco Wholesale Corporation, located at: 27972 Cabot Road, Laguna Niguel, California, defendants and each of them so carelessly and negligently owned, maintained, managed and operated the premises which caused Plaintiff to slip and fall on either fruits or other items which were on the floor at the back of the store, which caused plaintiff to sustain serious and severe injuries.

Prem.L-2. ☒ **Count One—Negligence** The defendants who negligently owned, maintained, managed and operated the described premises were (names):
Costco Wholesale Corporation.

☒ Does 1 to 5

Prem.L-3. ☐ **Count Two—Willful Failure to Warn** [Civil Code section 846] The defendant owners who willfully or maliciously failed to guard or warn against a dangerous condition, use, structure, or activity were (names):

☐ Does toPlaintiff, a recreational user, was ☐ an invited guest ☐ a paying guest.

Prem.L-4. ☐ **Count Three—Dangerous Condition of Public Property** The defendants who owned public property on which a dangerous condition existed were (names):

☐ Does to

a. ☐ The defendant public entity had ☐ actual ☐ constructive notice of the existence of the dangerous condition in sufficient time prior to the injury to have corrected it.

b. ☐ The condition was created by employees of the defendant public entity.

Prem.L-5.a. ☒ **Allegations about Other Defendants** The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names):

☒ Does 6 to 10

b. ☐ The defendants who are liable to plaintiffs for other reasons and the reasons for their liability are ☐ described in attachment Prem.L-5.b ☐ as follows (names):

Page 1 of 1

EXHIBIT “B”

MIRHOSSEINI LAW GROUP, A Professional Law Corporation

1502 N. Broadway, Santa Ana, California 92706. Tel. (714) 560-9100. Fax. (714) 560-9120

Senders Direct E-mail: ali@armlaw.net

March 08, 2022

Via Email: timdexter@gbtpa.com

Gallagher Bassett
Attn: Tim Dexter, CPCU
P.O. Box 2934
Clinton, IA 52733-2934

**Re: Our Client: Mostafa Taghavi
Your Insured: Costco Wholesale
Date of Loss: February 3, 2021
Claim No: 00363-602527-GB-01**

Dear Mr. Dexter;

Enclosed please find our demand package submitted on behalf of our client for the injuries and damages sustained in the above referenced accident.

Once you have had an opportunity to review the contents of this package, please contact our office so that we may discuss an amicable resolution of this matter.

The information supplied to you herein is for the limited purpose of negotiation and settlement and may not be used for any other purpose including litigation.

Sincerely,
Mirhosseini Law Group, APC
Ali R. Mirhosseini
Ali R. Mirhosseini, Esq.

ARM/al

IN THE MATTER OF MOSTAFA TAGHAVI

Claim No: **00363-602527-GB-01**

Claimant: **Mostafa Taghavi**

Date of Loss: **February 3, 2021**

Submitted to: **Gallagher Bassett**

Submitted by: **Mirhosseini Law Group**
Ali Mirhosseini, Esq.
1502 N. Broadway
Santa Ana, CA 92706
(714) 560-910

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Statement of Facts

- I. Background
- II. Medical Treatment

EXHIBIT 1

Medical Report

EXHIBIT 2

Medical Billing

EXHIBIT 3

Demand for settlement

Statements of Facts

I. Background

On February 3, 2021 Mr. Mostafa Taghavi, an elderly person, was shopping at the Costco Wholesale located in Laguna Niguel, California, when he was severely injured as a result of a slip and fall caused by a wet floor. Mr. Taghavi sustained injuries to his neck, shoulder and back.

II. Medical Treatment

Mr. Taghavi was seen by an orthopedic surgeon, Kamran Aflatoon, M.D. due to the severity of the pain. He was subsequently prescribed physical therapy. Due to ongoing symptoms, and multiple disc herniations in his cervical and lumbar spine he was forced to receive multiple epidural injections in his lumbar and cervical region. Detailed medical billing and reports are attached hereto.

EXHIBIT 1

Medical Report

Dr. Kamaran Aflatoon, DO

2492 Walnut Ave, #110
Tustin, CA 92780
714-669-1997

Mohebbi Wellness Center

Dr. Farhad Mohebbi, D.C.

23441 South Pointe Drive, Suite 250
Laguna Hills, CA 92653
949-556-9263

EXHIBIT 3

Demand for Settlement

Mr. Taghavi, an elderly person has sustained serious and severe injuries to his lumbar and cervical spine as a result of the slip and fall giving rise to this action. He has endured many months of pain and continues to do so. His injuries consist of Cervical Disc Herniation; Torn Rotator Cuff Right Shoulder, Bursitis Right Hip and cervical Radiculopathy. Based on his MRI study and diagnosis, he was referred to receive physical therapy. He receive maximum benefit from physical therapy, however he continued to have severe pain. Finally he undergone surgery and received epidural steroid injection at C5-6 and C6-7. He also received myelography at C5-6 and C6-7. As for his lumbar spine, he received a transforaminal myelography at bilateral L3-4, and Transforminal epidural steroid injection at bilateral L3-4. Even though he has received full benefit of maximum medical care, Mr. Taghavi continues to struggle on a daily basis. He has pain, and is unable to perform his daily tasks without a struggle.

We believe that Mr. Taghavi should be compensated for his damages and injuries. Our current demand to resolve this matter is in the sum of \$250,000.00.

EXHIBIT “C”

BRIAN W. SKALSKY, SBN 277883
Brian.Skalsky@fmglaw.com
KINGSLEY FORRESTER, SBN 327169
Kingsley.Forrester@fmglaw.com
FREEMAN MATHIS & GARY, LLP
3030 Old Ranch Pkwy, Suite 200
Seal Beach, CA 90740-2752
Telephone: 562.281.4517
Facsimile: 833.317.0293

Attorneys for Defendant
COSTCO WHOLESALE CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

MOSTAFA TAGHAVI,

Plaintiff,

vs.

COSTCO WHOLESALE COPORATION,
DOES 1 THROUGH 20,

Defendants.

CASE NO.: 30-2022-01274833-CU-PL-CJC
Assigned to Hon. Michael J. Strickroth
[Complaint Filed on August 10, 2022]
Trial Date: None

**NOTICE TO ADVERSE PARTIES AND
THE SUPERIOR COURT OF REMOVAL
OF ACTION**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD, AND TO THE
CLERK OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, IN AND FOR
THE COUNTY OF ORANGE:**

PLEASE TAKE NOTICE that Defendants COSTCO WHOLESALE CORPORATION, pursuant to 28 U.S.C. § 1441, filed a Notice of Removal of this action in the United States District Court for the Central District of California on September 22, 2022. The Superior Court of the State of California, County of Orange, is hereby advised that, pursuant to 28 U.S.C. §§ 1446, the filing of the Notice of Removal in the United States District Court, together with the service and filing of a copy of that Notice with this Court, effects the removal of the above-entitled action, which can proceed no further in this action, unless and until such time as the action may be remanded by order of the United States District Court. A copy of the Notice of Removal is attached to this Notice as

1 **Exhibit 1** and is served and filed herewith.

2 Defendants therefore reserve all defenses and objections to Plaintiff's Complaint, including
3 but not limited to, lack of personal jurisdiction, improper venue, forum non conveniens,
4 insufficiency of process, insufficiency of service of process, and failure to state a claim upon which
5 relief can be granted.

6 DATED: September 22, 2022

FREEMAN MATHIS & GARY, LLP

7
8 By:



9 BRIAN SKALSKY, ESQ.
10 KINGSLEY FORRESTER, ESQ.
11 Attorneys for Defendants,
12 COSTCO WHOLESALE WAREHOUSE
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within action; my business address is 3030 Old Ranch Parkway, suite 200, Seal Beach, CA 90740.

On September 22, 2022, I served the foregoing document described as

NOTICE TO ADVERSE PARTIES AND THE SUPERIOR COURT OF REMOVAL OF ACTION

on the interested parties in this action:

PLEASE SEE ATTACHED PROOF OF SERVICE LIST

— **BY MAIL.** I caused such envelopes with postage thereon fully prepaid to be placed in the United States mail in the County of Los Angeles.

— **BY PERSONAL SERVICE.** I caused such envelopes to be delivered by hand to the offices of the addressee.

— **BY FACSIMILE.** I caused such documents to be sent to the address above via the facsimile number indicated.

— **BY OVERNIGHT MAIL:** By UPS, following ordinary business practices for collection and processing of correspondence with said overnight mail service, the document listed above was placed in a sealed envelope addressed to the parties set forth on the attached Service List, and delivered to an authorized courier or driver authorized by the express service carrier, with delivery fees fully prepaid or provided for.

— **BY EMAIL** I caused a copy of the document(s) to be sent by email from the email address amber.taylor@fmglaw.com to the persons at the email addresses listed in the Service List. I did not receive within a reasonable time after the transmission any electronic message or any other indication that the transmission was unsuccessful.

X **BY ELECTRONIC SERVICE** I electronically served the attached documents(s) on each party or other person that is required to be served and accept service of documents electronically pursuant to Code of Civil Procedure section 1010.6(4).

Executed on September 22, 2022, at Seal Beach, California.

X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Lisa Khan

SERVICE LIST

Taghavi v. Costco, et al.
Case No.: 30-2022-01274833-CU-PL-CJC

Ali R. Mirhosseini, Esq. Sondra Kilgore, Esq. <i>Mirohosseini Law Group, APC</i> 1502 N. Broadway Santa Ana, California 92706 Phone: 714-660-9100, Ali@armlaw.net Sondra@armlaw.net	<i>Attorneys for Plaintiff</i>
--	--------------------------------

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen and not a party to the within action; my business address is 3030 Old Ranch Parkway, Suite 200, Los Angeles, California 90071.

On September 22, 2022 I served the foregoing document described as

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441

on the interested parties in this action:

PLEASE SEE ATTACHED PROOF OF SERVICE LIST

— **BY MAIL.** I caused such envelopes with postage thereon fully prepaid to be placed in the United States mail in the County of Los Angeles.

— **BY PERSONAL SERVICE.** I caused such envelopes to be delivered by hand to the offices of the addressee.

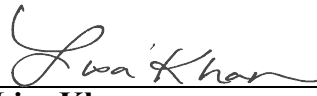
— **BY OVERNIGHT MAIL:** By **UPS**, following ordinary business practices for collection and processing of correspondence with said overnight mail service, the document listed above was placed in a sealed envelope addressed to the parties set forth on the attached Service List, and delivered to an authorized courier or driver authorized by the express service carrier, with delivery fees fully prepaid or provided for.

— **BY EMAIL** I caused a copy of the document(s) to be sent by email from the email address amber.taylor@fmglaw.com to the persons at the email addresses listed in the Service List. I did not receive within a reasonable time after the transmission any electronic message or any other indication that the transmission was unsuccessful.

X **BY ELECTRONIC SERVICE** I electronically served the attached documents(s) on each party or other person that is required to be served and accept service of documents electronically pursuant to Code of Civil Procedure section 1010.6(4).

Executed on September 22, 2022, at Los Angeles, California.

X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Lisa Khan

SERVICE LIST

Taghavi v. Costco, et al.
Case No.: 30-2022-01274833-CU-PL-CJC

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